

PD-0948-17

IN THE
COURT OF CRIMINAL APPEALS
OF TEXAS

FILED
COURT OF CRIMINAL APPEALS
1/3/2018
DEANA WILLIAMSON, CLERK

STATE OF TEXAS,	§	
Appellant,	§	Eighth Court of Appeals
	§	No. 08-15-00205-CR
vs.	§	Appeal from the 243rd District Court
	§	of El Paso County, Texas
CRISPEN HANSON,	§	TC No. 20120D03212
Appellee,	§	

FIRST MOTION FOR EXTENSION OF TIME TO FILE
APPELLEE'S REPLY BRIEF TO STATE'S BRIEF IN SUPPORT OF
PETITION FOR DISCRETIONARY REVIEW

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

Appellee files this first motion for an extension of **30 days** in which to file the Appellee's Reply Brief. In support of this motion, Appellee would show the Court the following:

I.

The deadline for filing the Appellee's Reply Brief is **December 31, 2017**. Appellee requests a **30 day extension** of time until January 30, 2018 for Appellee to file his reply brief. This is the first requested extension.

II.

Appellee's request for an extension is based upon the following:

1. Counsel prepared for a Jury Trial that began on November 27, 2017 in the case styled *State v. Hoffman*, cause number 20100D04691 out of the 409th District Court. The jury was selected on November 27th and the evidence and closing arguments occurred on December 5th and 6th. Defendant was charged with a first-degree felony.
2. Counsel prepared for a jury trial scheduled for December 12, 2017, in the case styled *State v. Zapata*, cause number 20140C00767 out of El Paso County Court at Law Number One.
3. Counsel is preparing Appellant's Brief due on January 19, 2018 to the Eighth Court of Appeals in the case styled *State v. Ramirez* cause number 08-17-00106-CR.
4. Counsel is preparing Appellant's Brief due on January 19, 2018 to the Eighth Court of Appeals in the case styled *State v. Martinez*, cause number 08-17-00165-CR.
5. Counsel is preparing Appellant's Brief due on January 21, 2018 to the Eighth Court of Appeals in the case styled *State v. Martinez* cause number 08-17-00106-CR.
6. Counsel is preparing Appellant's Brief in the case styled *United States v. Muniz-Cereceres*, cause number 17-50494, due on January 2, 2018, to the Fifth Circuit.

7. Counsel is preparing Appellant's Brief due on December 29, 2017 to the Eighth Court of Appeals in the case styled *State v. Perez*, cause number 08-13-00024-CR.

WHEREFORE, the undersigned counsel prays that the Court grant this Motion and extend the deadline for filing Appellee's Reply Brief to the State's Brief in support of petition for discretionary review to January 29, 2017.

Respectfully submitted,

/s/ Ruben P. Morales
RUBEN P. MORALES
Attorney for Appellant
State Bar No. 14419100
718 Myrtle Avenue
El Paso, Texas 79901
(915) 542 - 0388
(915) 207-1136 fax
rbtnpmrls@gmail.com

CERTIFICATE OF SERVICE

I, RUBEN P. MORALES, certify that a copy of the foregoing instrument was sent by email through an electronic-filing-service provider, to Tom Darnold, with the District Attorney's Office at tdarnold@epcounty.com and, the State Prosecuting Attorney, information@SPA.texas.gov.

/s/ Ruben P. Morales
RUBEN P. MORALES